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Advocating responsible planning and governance in Queensland

Strategic Planning (Amendment package Q)
City Planning and Economic Development
Brisbane City Council
GPO Box 1434
Brisbane QLD 4001

Dear Brisbane City Council

Submission by South east Queensland Community Alliance (SEQCA) about Amendment Package Q

Please find attached a submission from the South East Queensland Community Alliance (SEQCA) about Amendment Package Q Subtropical building design planning scheme policy.

SEQCA is a not-for-profit umbrella organisation formed by planning and environmental advocacy groups based across SEQ. Our mission for the communities and buildings we live in is:

- **Fast track to sustainability:** Water wise and carbon negative.
- **Pursue resilience:** Lifting the benchmarks and not compounding the problems.
- **Defend our greenspace:** Safeguarding our existing greenspace and adding to the stock.
- **Secure our local:** Ensuring the character and liveability of our communities is not overwhelmed by bland, profit driven development.

More information about SEQCA is available on our website at: <https://seqalliance.org/>

We welcome this opportunity to make a submission on Brisbane's proposed Subtropical Design planning scheme policy.

Yours sincerely

A handwritten signature in blue ink that reads 'C Walker'.

Chris Walker
President
South East Queensland Community Alliance (SEQCA)
Telephone: 0419 675 465

General comment

We note that Council is seeking to extend the application of the *Buildings that Breathe Guidelines* to additional building typologies to help ensure new development delivers a clean, green and sustainable Brisbane. We welcome the careful selection and guidance on sub-tropical design principles included in this document.

However, we are facing a climate crisis, a biodiversity crisis and multiple health crises (mental health, obesity etc). In these circumstances, we believe the policy needs to be more ambitious generally and to guarantee an overall compliance standard. It needs to require a clear and ambitious level of compliance with the elements and sub-elements of the policy and /or equivalent certification schemes - as in the **Brisbane Green Buildings Incentive Policy**.

For instance, in the Brisbane Green Buildings Incentive Policy, residential buildings must meet at least one of the following design criteria:

- a) *Complied with the criteria and sub-elements under the New World City Design Guide – Buildings that Breathe:*
 - i) *for buildings three to seven storeys, the development must comply with 15 sub-elements*
 - ii) *for buildings eight to 15 storeys, the development must comply with 20 sub-elements*
 - iii) *for buildings over 15 storeys, the development must comply with 25 sub-elements.*
- b) *Obtained a Green Star certified rating (a minimum of five stars) from the Green Building Council of Australia at the “as built” stage of the development.*
- c) *For buildings three to 15 storeys, obtained a minimum six-leaf certified rating from the Urban Development Institute of Australia’s EnviroDevelopment rating tool at the “as built” stage of the development.*
- d) *Obtained a carbon neutral certification (whole building operation) against the Australian Government’s Climate Active Carbon Neutral Standard for Buildings.*
- e) *Achieved a minimum green plot ratio³, defined as the total of all vegetated landscaping ÷ total site area, which may include deep planting, green walls, green facades, green roofs (intensive and extensive) and planting at podium excluding usable balcony space in accordance with the definitions in Table 1, as follows:*
 - i) *for buildings three to 15 storeys, the minimum green plot ratio is 75%*
 - ii) *for buildings 16 to 25 storeys, the minimum green plot ratio is 150%*
 - iii) *for buildings above 25 storeys, the minimum green plot ratio is 250%*

We submit that, in the absence of an overall, well defined compliance requirement, the proposed policy will not adequately serve the goal of ensuring new development delivers a clean, green and sustainable Brisbane. It fails to give any clear guidance to the community about what to expect from new development.

Specific comments

The following are our specific comments on some aspects of the proposed planning policy:

Elements 2 – 5: Orientation, outdoor spaces, ventilation, shading etc.

Passive building design principles: In general, we welcome the elaboration of passive design principles relevant to Brisbane's sub-tropical environment in elements 2, 4 and 5. We note single dwelling, residential buildings will soon be required to meet a 7 star rating in the NatHERs rating scheme and that scheme includes passive design principles. We note many of the commercial and residential buildings covered by this proposed planning policy do not need to meet *any* national rating standard. This is manifestly unfair to residents subject to the NatHERs scheme. *We believe development covered by this policy should be required to meet one or more of the certification standards applied in the Brisbane Green Buildings Incentive Policy or at least a 4 star NABERS energy rating. Without a requirement of this type, the community has NO GUARANTEE these developments will meet or better the efficiency requirements for single residential dwellings.*

2.3 Street activation: Street activation should include non-commercialised publicly accessible features including soft landscaping and seating areas to encourage social gathering outdoors .

3.2 Sky terraces: The use of sky terraces should be discouraged unless it is compatible with the provision of rooftop solar and compatible with Council's guidelines for rooftop gardens. We welcome the emphasis on living greenery at ground floor and lower building levels in Element 6.

3.3 Occupy outdoor spaces – private open space and balconies: We note the absence of any minimum area requirements for private open space – this is sub-standard in comparison to requirements for single residences subject to NatHERs requirements. The inclusion of air conditioning units or other utilities on private balconies should be unacceptable (not just discouraged).

3.6 Movement networks: These should *always* cater for pedestrians - including disabled access - and *normally* cater for active transport users unless exceptional circumstances apply.

4.1 Setbacks and separation distances: We note the absence of any minimum setback requirements. This is unacceptable. Minimum setbacks are essential and must allow for deep planting to provide privacy, amenity, street activation, permeability, shade and natural cooling.

4.4 Optimising natural ventilation: We welcome the inclusion of operable windows and measures supporting natural cross ventilation.

5.4 Awnings and colonnades: We welcome the inclusion of awnings and colonnades.

Element 6: Living greenery

We believe, sub-tropical design must embrace existing vegetation and contribute to nature positive outcomes for the city. We welcome the inclusion of guidance on living greenery but note the absence of any minimum landscaping requirements.

We recommend the policy adopts the minimum green plot ratios in the Brisbane Green Buildings Incentive Policy. We agree that landscaping should be prioritised for areas that engage with the public realm and especially on ground and lower levels (6.4).

Ground level vegetation offers the maximum benefits and should be prioritised – at least 50% of the solution should be at ground level. *Existing mature trees should be retained wherever possible and setbacks must be sufficient to allow for deep planting.* If these essential measures will be compromised, then nature-based offsets in close proximity to the development should be required.

7: Identity matters

We believe sub-tropical design should contribute to place-making and community wellbeing. Our sub-tropical city is an enviable and desirable place to live attracting rapid population growth. We need to ensure development contributes to the community's sense of place and wellbeing – to help foster inclusion, agency, connection and attachment.

We welcome the inclusion of guidance on Identity matters but note there is no specific reference to Brisbane's timber and tin heritage. We believe development should complement and extend our existing natural and built (timber and tin) heritage; major views and /or other existing local features.

It should also enhance a sense of community for residents within the building itself by including non-commercialised, common use areas suitable for a range of age groups. These should be integrated closely with and seamlessly accessed by residents (not isolated on particular floors or rooftops). They should be designed to encourage lingering and informal socialising for residents.

8: Reduce energy and waste

We are disappointed by the low level of support for energy efficiency and renewable energy generation (zero carbon or negative emissions) requirements in the draft planning policy. Brisbane's subtropical environment is endowed with year-round, abundant solar generating capacity. There are mandatory requirements for single residential dwellings to achieve a whole of home energy rating.

We should expect and demand **higher standards** from development covered by this policy. In our view, development covered by this policy should be designed to be climate positive (zero carbon or negative emissions). Developments that cannot meet this climate positive standard should be required to offset their emissions by installing rooftop solar panels (or an alternative equivalent solution) on other public or community buildings in the vicinity.

Our subtropical environment is also prone to extreme weather events including droughts, heavy rainfall and flooding. Our built environment needs to be resilient to these events – this is not an optional extra. Minimum requirements for grey water recycling, water wise infrastructure and /or porous landscaping at ground level should be an essential (not optional) requirement in Brisbane's subtropical design policy.